

EMPLOYMENT BACKGROUND INVESTIGATIONS

PROCEDURES AND GUIDELINES

For

Background Investigations Group and National Staffing

Purpose

These procedures and guidelines support Verizon Communications' Employment Background Investigation Policy. The Security Department's Background Investigations Group and Human Resources' National Staffing organization utilize these procedures and guidelines that define the process flow involved in performing background investigations of applicants seeking employment consideration with Verizon Communications.

Introduction

The Background Investigations Group (BIG) serves as the liaison to the Human Resource National Staffing organization, the applicant seeking employment consideration with Verizon Communications, and the background investigations' processing vendor. The BIG's primary function is to verify information furnished by the applicant on the Employment Application and research discrepancies that are reported in the Background Investigation (BI) report provided by the processing vendor. Upon completion of the background investigation, the BIG is responsible for making a recommendation to a Staffing Account Manager (SAM) as to the employment eligibility of the applicant.

Scope

1. These procedures and guidelines apply to those Verizon Communications' business units for which the National Staffing organization provides staffing services. The staffing organizations of other Verizon business units may adopt these procedures and guidelines at their discretion.
2. Where permitted by law, all applicants applying for employment with Verizon Communications for the **first time** are required to undergo a full background investigation as set forth in the "Components and Parameters of Background Investigation" section of the Employment Background Investigations Policy.
3. Background investigation results are valid for one year from the date of the report's completion.

4. Former Verizon Communications' employees (i.e., retirees, non-retirees, interns, etc.) who are rehired more than one year following their separation date are required to undergo a background investigation.
5. If an applicant was not hired due to derogatory information derived from the Background Investigation Report, then the applicant cannot reapply for employment with Verizon for one (1) year. If the derogatory information discovered is based upon an issue with its own timeframe (i.e., probation for a minor offense, active bench warrant, diversion program, driver's license suspension), then the SAM may select a different reapplication date within the one (1) year waiting period. The reapplication decision should be based upon the completion of the issue.

Applicant Responsibilities

1. The applicant is solely responsible for providing the SAM an accurate and complete disclosure of information requested in the Employment Application.
2. The applicant is obligated to respond to any and all questions from SAM or the BIG regarding omitted, incomplete, or questionable information on the Employment Application.

SAM Responsibilities

1. The SAM is the initial point of contact for applicants.
2. The SAM will perform initial review and verification of information provided on the Employment Application. It is SAM's responsibility to contact the applicant to resolve omitted, incomplete, or questionable information on the Employment Application **PRIOR** to sending the application to the Background Investigation Group for processing. **The Background Investigation Group will not process incomplete applications until the information is provided.**
3. The SAM will provide all requested information on the "Background Investigation Request Form" that is to be faxed or electronically transmitted, along with the Employment Application, to the BIG in order to initiate the background investigation. Any additional checks outside the designated standard scope of investigation must be noted on this form. When requesting education verifications for a high school diploma the SAM must note the dates of attendance on the request form. In the case of GED's the testing date and location of test must be noted on the Background Investigation Request Form.
4. The SAM will make the final hiring decision based on the recommendation submitted by the BIG.

Background Investigations Group (BIG) Responsibilities

1. The Background Investigations Group (BIG) is the liaison between the applicant, National Staffing and the background investigations processing vendor.
2. The BIG serves as the single point of contact for SAM as subject matter experts.
3. The BIG is responsible for:
 - ?? Conducting an unbiased and thorough background investigation of the information provided by the applicant in the Employment Application. This investigation will be performed in a timely fashion by utilizing the background investigations' vendor.
 - ?? Providing standardized and accurate reporting of background investigation results to the SAM.
 - ?? Retention of derogatory, differing and unverifiable background investigation information for a period time required by law.
 - ?? Communicating the Background Investigation recommendation in regard to the hiring eligibility of the applicant to the SAM.
 - ?? Ensuring accuracy of billing information and processing payment to the background investigations' vendor.

Components and Parameters of Background Investigation

The following components, and parameters of each component, of the background investigation will be conducted on each applicant, unless prohibited by law in the state in which the applicant seeks employment:

a) Criminal History

- ?? Felony and misdemeanor convictions within the state or county of residency and employment (including military service) for the previous seven (7) years.
- ?? Current status of pending felony and misdemeanor criminal charges within the state or county of residency and employment.

- ?? Status of current participation in any pretrial or alternative rehabilitative program within the state or county of residency and employment.
- ?? All applicable court searches (i.e., County Clerk of Court, City or Municipal Court, etc.) and a National Criminal File database search will be conducted to obtain the necessary criminal history information. Statewide searches are only performed in those states that have repositories where the integrity of the data is reliable, and no specialized forms are required to be completed (such as notarized releases, fingerprint cards, etc.), and can facilitate a five-day turnaround on information requested.

a) Driver's License Status and Driving Record

- ?? If the applicant is being hired for a "driving" position (i.e., a position requiring an employee to drive a Company or personal vehicle in the regular performance of their duties), the validity and current status of the current driver's license is verified. Driving offenses and moving traffic violations for the previous three (3) years are also checked.
- ?? **Do Not** request a driving record search unless the applicant is being hired for a driving position.

a) Employment History

- ?? Current Position - Unless indicated on the Employment Application, current employers will be approached as "credit checks" so as not to jeopardize the applicant's current position. In the event that the current employer request employment verifications in writing only; then the BIG analyst will contact the applicant for verbal authorization. If the applicant does not grant authorization, then a W-2 will be used for verification.
- ?? Previous Employment – The previous seven (7) years of employment is verified. Previous employers are approached as valid employment verifications and are pursued in writing if necessary to obtain verification. If the previous employer is military, then the SAM is responsible for including a copy of the applicant's DD-214. The employment information that is verified includes:
- ✍✍ Tenure (dates of employment)
 - ✍✍ Position/Job Title and Job Duties
 - ✍✍ Earnings (positions eligible for wage credit will be checked, if requested by SAM)
 - ✍✍ Reason for leaving
 - ✍✍ Rehire status
 - ✍✍ Recommendations from listed supervisors

a) Educational Verification

?? When requested by SAM, verification is made of the highest diploma or degree earned that is listed on the Employment Application.

- ~~✓~~ ~~✓~~ Highest diploma or degree earned
- ~~✓~~ ~~✓~~ Associate/Bachelors/Masters/Ph.D.
- ~~✓~~ ~~✓~~ Certifications
- ~~✓~~ ~~✓~~ Professional Licenses

?? Professional licenses and/or certifications are verified only if they hold relevance to the job function.

a) Social Security Number Verification

?? The Social Security Number listed on the Employment Application is verified with the applicant's name. All information derived from this search is compared with the associated information listed on the Employment Application (i.e., residential addresses, prior employers, date of birth, etc.) and any discrepancies are reported.

f) International Searches

?? Applicants coming directly from another country will be subject to an International background search in their country of residency.

?? If the applicant has resided in the US for one (1) year or more, the BIG will not run an International Search.

?? Many countries **require applicant participation**, due to the countries not considering criminal history as public information. These countries require the applicant to go to their consulate and request the criminal history by filling out a request form and paying a fee. Since this is the only way for the BIG to retrieve international criminal searches it is a requirement. The applicant is then responsible for forwarding the official document to the BIG analyst.

?? International Background Investigations will not meet, and are exempt from, the required six (6) business day recommendation response. International searches will have recommendations sent as soon as results are received. Due to language barriers, and other obstacles, the BIG can not guarantee a definite recommendation deadline.

Summary of Background Investigation Components and Parameters

BI Component	BI Parameter	When Required
Criminal History	Felony and misdemeanor convictions within the state or county of residency and employment (including military service) for the previous seven (7) years. Current status of pending criminal charges and outstanding warrants. Status of current participation in a pretrial probation or alternative rehabilitative program.	Always
Driver's License Status and Driving Record	Validity and current status of driver's license. Driving offenses and moving traffic violations for the previous three (3) years.	When the job position requires driving a Company or personal vehicle in the regular performance of duties. SAM will request record search when required.
Employment History	Previous seven (7) years of employment and military service are verified.	Always
Educational Verification	Verification made of the highest diploma or degree earned. When necessary, licenses and certifications are verified.	Upon request from SAM.
Social Security Number	Determine names to which Social	Always

BI Component	BI Parameter	When Required
Verification	Security Number is attributed.	
International Search	Applicants coming directly from another country will be subject to an International background search in their country of residency.	Always

Process to Initiate a Background Investigation

1. In order to initiate a background investigation, there must be a completed Employment Application, including the “Consumer Report and Investigative Consumer Report Authorization/Disclosure” form, signed by the applicant within six (6) months of the Application’s submission to the BIG. If six (6) months have expired since the Application and authorization/disclosure form were completed, then a new Application and authorization/disclosure form must be completed and signed.

a) Required Data (Domestic Applications):

- ?? Full and legible legal name
- ?? Social Security Number (where permitted based on geographic disclosure/privacy laws)
- ?? Date of Birth (where permitted based on geographic disclosure/privacy laws)
- ?? Driver’s License number, name (as it appears on license), state of issue and status of license (active, suspended, etc.)
- ?? For Driving Positions, driving history for last three (3) years (DUI/DWI, moving violations, etc.)
- ?? Previous addresses for past seven (7) years
- ?? Educational information (last date attended or date degree/diploma conferred)
- ?? Employment history (past seven years including present employer)
- ?? Criminal History disclosed – if applicable

b) Required Data (International Applications)

- ?? Full and legible legal name

- ?? Social Security Number (where permitted based on geographic disclosure/privacy laws)
 - ?? Date of Birth (where permitted based on geographic disclosure/privacy laws)
 - ?? Driver's License number, name (as it appears on license), state of issue and status of license (active, suspended, etc.)
 - ?? For Driving Positions, driving history for last three (3) years (DUI/DWI, moving violations, etc.)
 - ?? Previous International residential addresses for past seven (7) years
 - ?? Educational information (last date attended or date degree/diploma conferred)
 - ?? Employment history (past seven years including present employer)
 - ?? Criminal History disclosed – if applicable
 - ?? Many countries **require applicant participation**, due to the countries not considering criminal history as public information. These countries require the applicant to go to their consulate and request the criminal history by filling out a request form and paying a fee. Since this is the only way for our organization to retrieve international criminal searches it is a requirement. The applicant is then responsible for forwarding the official document to the BIG analyst.
 - ?? For countries the BIG can access, that have requirements not listed on the application specific to the individual country(ies). The BIG Analyst will be responsible for communicating with the SAM, or applicant when more information is needed (for example, seat or registration numbers for education, mother and fathers full legal names for criminal history, etc.)
- a) "N/A" (Not Applicable) should be designated on any part of the Employment Application that does not pertain to an applicant.
1. The SAM will fax or electronically transmit the completed Employment Application to the BIG. When faxing or electronically transmitting the Application, the Staffer must provide all requested information on the "Background Investigations Request Form" to ensure that the proper background investigation scope is conducted, including noting whether driving or education check(s) are needed.
 2. The BIG will fax or electronically transmit the Employment Application with instructions to the background investigations' vendor. The vendor conducts the background investigation according to the identified review components and parameters (which are set forth in this procedure and the contract agreement with the vendor).
 3. The vendor will provide substantially completed background investigation results to the BIG within three (3) **business** days, excluding International, of receipt of the Employment Application facsimile or electronic transmission. The vendor will expeditiously follow-up on pending searches and report the results of these pending searches immediately upon receipt.

Reporting Investigative Results and Hiring Recommendation to Staffing

1. The BIG reviews all information provided by the applicant in the Employment Application and compares it to the information contained in the Background Investigation Report submitted by the background investigations' vendor. The BIG evaluates this information against the "Job Aid and Decision Matrix for Background Investigation Hiring Recommendation" guidelines in order to formulate its hiring recommendation to SAM.
2. A hiring recommendation will be made by the BIG and communicated to the SAM.
 - ?? This recommendation will be forwarded to the Staffer within six (6) **business** days of the Employment Application being submitted to the Background Investigations' vendor. In some cases, the application may not be submitted to the vendor until the day after it was received from the SAM. This will only happen when the application is received by the BIG after the cutoff time required by the vendor. **The cutoff time is 12:00 (noon) central standard time, any applications received after this time will be processed at the beginning of the next business day.**
 - ?? International Background Investigations will not meet, and are exempt from, the required six (6) business day recommendation response. International searches will have recommendations sent as soon as results are received. Due to language barriers, and other obstacles, the BIG can not guarantee a definite recommendation deadline
1. A recommendation to hire the applicant will be communicated by electronically attaching the "Hiring Recommendation Form," from the BIG Analyst to the SAM, via an e-mail message.
 - ?? The "Hiring Recommendation Form" notifies the SAM which components of the Background Investigation have been reviewed and completed without findings of significant derogatory information. Each component completed will be marked with an "X" beside it. Any component that is left blank is still pending results, and any component that has a "NA" was not requested - or there was no history to search (i.e., applicant with no employment history).
 - ?? If a recommendation to hire the applicant is considered "Contingent", meaning the BIG has given a recommendation to hire - yet the recommendation form shows that there are still components pending. Then this is the only recommendation the SAM will receive, unless there is derogatory information found.
 - a) If there is no derogatory information found on an application that had a "Contingent" recommendation to hire sent, then it is the responsibility of

the SAM to send a written request for a final update, if needed.

- b) If there is derogatory information found on an application, then it is the responsibility of the BIG analyst to “Reverse” the hiring recommendation to Recommend Not To Hire.

1. The BIG analyst will personally contact, by telephone, the SAM to communicate a recommendation not to hire the applicant, and will follow-up with an official recommendation not to hire by e-mail.
- ?? The BIG’s findings and reasons for the recommendation not to hire of the applicant will be disclosed to the Staffer by telephone, and the BIG analyst will also follow-up with an official recommendation not to hire by e-mail.
- ?? The **FINAL** hiring decision is determined by the SAM. If the Staffer wishes to proceed with hiring the applicant despite a recommendation not to hire from the BIG analyst; then the SAM will discuss the matter with the Staffing Manager. Once a final decision is made, the **Staffing Manager** will inform the BIG Analyst of this decision by e-mail. The override decision must be made by the staffing manager, and must be in writing.

Derogatory Information

1. Information that would be considered derogatory and may result in a recommendation not to hire by the BIG includes:
 - a) Intentional falsification, omission, or misrepresentation of any information requested on the Employment Application.
 - b) Criminal History information (i.e., felony and misdemeanor convictions, pending criminal charges, outstanding felony warrants, and current participation in a pretrial probation or alternative rehabilitative program) obtained through the background investigation that was not listed on the Employment Application by the applicant. Also, this same Criminal History information, even if listed on the Employment Application by the applicant, is evaluated against the “Job Aid and Decision Matrix for Background Investigation Hiring Recommendation” guidelines in order to formulate a hiring recommendation.
 - c) Educational degrees, licenses, certifications, etc. that are found to be false or unverifiable through the background investigation.
 - d) For driving positions (i.e., positions which require driving a Company or personal vehicle in the regular performance of duties), driving offenses are evaluated against

the “Job Aid and Decision Matrix for Background Investigation Hiring Recommendation” guidelines in order to formulate a hiring recommendation.

- e) Previous employment information that surfaces in the employment verification portion of the background investigation that is job-related and indicates a propensity of dishonesty, lack of integrity, criminal behavior, or endangering persons in the workplace.

Fair Credit Reporting Act (FCRA) Procedures

1. At the time of the BIG’s recommendation not to hire and concurrence from the Staffer, the Staffer will advise the BIG to proceed with the Fair Credit Reporting Act (FCRA) letter notification process informing the applicant that adverse action is being considered regarding their employment consideration.
 2. The FCRA requires that the applicant be contacted twice; first advising that Verizon Communications is contemplating adverse action and second to notify that adverse action has been taken.
 3. There is a waiting period of at least twenty-four (24) business hours before the second notification will be sent to the applicant. The waiting period can be extended at Verizon Communications’ discretion.
- ?? An initial form letter is mailed to the applicant (or faxed to the Staffer) by the BIG stating that Verizon Communications is contemplating a decision not to finalize a contingent offer or continue contingent employment. A copy of the applicant’s Background Investigation Report, along with a copy of the “Prescribed Summary of Consumer Rights Under the Fair Credit Reporting Act,” is attached as supporting documentation.
- ?? After a minimum of twenty-four (24) business hours, if appropriate, a second form letter will be mailed by the BIG to the applicant (or faxed to the SAM) as notification of a final decision not to finalize a contingent offer or continue contingent employment with Verizon Communications.

FCRA Notification to Applicant of Rescission of Contingent Job Offer

Step	Action
	<u>Staffing:</u>

Step	Action
1	<p>If the applicant is to report to work within five (5) business days, the SAM calls the applicant and advises him/her not to report until further notice. The applicant is also advised that a letter is being sent to advise of a change in circumstance. SAM also notifies the supervisor and Union representative if necessary.</p> <p>If the applicant is to report to work on a date beyond five (5) business days, there is no need for the SAM to call the applicant.</p>
2	<p>The BIG sends by regular mail to the applicant's home the following documents:</p> <ul style="list-style-type: none"> ?? FCRA letter of intent to rescind the contingent job offer ?? Copy of the Summary of Consumer Rights under the FCRA ?? Copy of the Background Investigations Report
3	<p>After 24 business hours from the date of mailing of the first FCRA letter, the BIG sends by regular mail to the applicant's home a second FCRA letter to the applicant to notify the applicant of the rescission of the contingent job offer.</p>

FCRA Notification to Employee of Termination of Contingent Employment

Step	Action
1	<p>The BIG faxes or electronically transmits to the SAM the following documents:</p> <ul style="list-style-type: none"> ?? The two FCRA notification letters (i.e., the "intent to terminate contingent employment" letter and the "terminate contingent employment" letter) ?? Copy of the Summary of Consumer Rights under the FCRA ?? Copy of the Background Investigations Report
2	<p>The SAM will coordinate the FCRA notification requirements and the separation procedures with the employee's supervisor.</p>

Document Retention

1. Files that are open, pending information, or awaiting FCRA action are maintained by the BIG apart from all other files and processed on a case-by-case basis.
2. Closed files that do not contain derogatory information are retained by the BIG for 90 days and organized by the month in which the file was closed. Electronic files are also retained by the processing vendor for six (6) years
3. Files containing derogatory information are maintained by the BIG for three (3) years in accordance with established case retention schedules. The processing vendor also retains electronic files for six (6) years.
4. Remittance invoices, check requisition documentation, and supporting invoice paperwork are maintained by the BIG for six (6) years.

Billing

1. Vendor costs for background investigations are billed **directly to the hiring department's budget center (or responsibility code)** by the BIG. This information is provided on the Background Investigation Request Form submitted by the SAM.

JOB AID & DECISION MATRIX FOR BACKGROUND INVESTIGATION HIRING RECOMMENDATION (except New York)

The Job Aid & Decision Matrix is established with the goals of protecting Verizon Communications from loss and liability, and for the protection of our employees and customers. BIG representatives will consult this Job Aid and Decision Matrix and use sound judgment to ensure that all hiring recommendations made to the SAM are consistent and based on objective criteria. Any situations that may warrant an exception to the “Recommended Action” in these guidelines are to be reviewed with the Staffing Manager.

If	And	Recommended Action	Special Requirements For State and Federal Laws
Applicant dishonest (i.e., intentional falsification, omission or misrepresentation of information) on the Employment Application, regardless of the nature of the information the applicant failed to disclose. (If a conviction has been expunged, failure to disclose it is not dishonest.)	Dishonesty discovered pre-hire	If circumstances warrant, the BIG will contact the applicant to have the applicant explain the dishonesty; unless the explanation is compelling, recommend not to hire.	<p>Mass: Prohibits asking about a first conviction for the following misdemeanors: drunkenness, simple assault, speeding, minor traffic violations, affray, or disturbance of peace or conviction of any misdemeanor greater than 5 years prior to request date unless any resulting incarceration was completed during the past five years or the applicant was convicted of another offense during that five year period. Minor traffic violations include any moving traffic violation other than reckless driving, driving to endanger and motor vehicle homicide.</p> <p>Rhode Island: Applicant is not dishonest if s/he fails to disclose if s/he has been arrested or charged with a crime which did not result in a conviction (even if still awaiting trial/disposition). Applicant is not dishonest if s/he fails to disclose an offense to which s/he pled “nolo contendere” or “no contest,” received only probation and served the entire probation without incident.</p>
	Dishonesty discovered post-hire	If circumstances warrant, the BIG will contact the employee to have the employee explain the dishonesty; unless the explanation is compelling, terminate employment.	

If	And	Recommended Action	Special Requirements For State and Federal Laws
Arrest disposition did not result in conviction (includes completion of pretrial diversion programs, dismissal of charges, etc.)		Do not disqualify.	
Active arrest warrant or awaiting disposition of pending criminal charges or trial		Defer consideration until the applicant is available for work on an uninterrupted basis.	<p>Mass: applicants may answer “no record” with regard to certain arrests.(see Application statement).</p> <p>Rhode Island: prohibits asking if applicant arrested or charged.</p>
Currently participating in a pretrial diversion probation, alternative rehabilitative program, or are currently on probation/parole for any offense (This would also included Deferred Adjudication)		Review “Hiring Recommendation Matrix” on the following page for type of offense to determine employment eligibility. If applicant would be ineligible for employment if convicted, or there is a possibility of incarceration if the pretrial diversion probation (deferred adjudication) or alternative rehabilitative program is not completed, then no employment offer should be made until the completion of the pretrial diversion probation or alternative program is completed. If the applicant is on probation/parole due to a conviction, then defer consideration until the applicant is available for work on an uninterrupted basis.	All States

If	And	Recommended Action	Special Requirements For State and Federal Laws
<p>If International information is not available on a particular candidate, or if the BIG does not have the ability to conduct a background search in that candidate's country of residence</p>		<p>Recommend Not to Hire</p>	
<p>Prior Conviction (includes "guilty" pleas or judgments, "no contest" or "nolo contendere" pleas)</p>		<p>Consider job relevancy, severity of offense, time since completion of sentence and evidence of rehabilitation according to the "Hiring Recommendation Matrix" on the following page.</p>	<p>Mass: prohibits asking about a first conviction for the following misdemeanors: drunkenness, simple assault, speeding, minor traffic violations, affray, or disturbance of peace or conviction of any misdemeanor greater than 5 years prior to request date unless any resulting incarceration was completed during the past five years or the applicant was convicted of another offense during that five year period. Minor traffic violations include any moving traffic violation other than reckless driving, driving to endanger and motor vehicle homicide.</p> <p>Rhode Island: Prohibits considering prior criminal offense if pled "nolo contendere" (no contest), received only probation and served entire probation without any violation, then not considered conviction.</p>

CRIMINAL & DRIVING HISTORY DECISION MATRIX (except New York)

Type of Offense	Severity of Offense (Felony or Misdemeanor)	Timeframe Since Completion of Sentence or Probation or Parole	Recommended Action
Offenses Against <u>Person</u> (e.g., murder, manslaughter, sexual assault, assault and battery, etc.)	Felony And Misdemeanor	Less Than 7 Years	No Hire
Offenses Against <u>Property</u> (e.g., theft, forgery, criminal trespassing, worthless checks, credit card fraud, shoplifting, gun possession, etc.)	Felony	Less Than 7 years	No Hire
	Misdemeanor	Less Than 3 years	Evaluate evidence of rehabilitation (ex: successfully held other jobs), and relationship of offense to the position applied for, and consider hiring.
		Over 3 Years	Hire
Drug Offenses	Felony	Less Than 7 Years	No Hire
	Misdemeanor	Less Than 3 Years	Evaluate evidence of rehabilitation (ex: successfully held other jobs), and relationship of offense to the position applied for, and consider hiring.

Type of Offense	Severity of Offense (Felony or Misdemeanor)	Timeframe Since Completion of Sentence or Probation or Parole	Recommended Action
		Over 3 Years	Hire
<p>Driving Offenses</p> <p>Notes: Only relevant to job positions that require driving a Company or personal vehicle in the regular performance of duties.</p> <p>Applicant cannot be hired if his/her driver's license is suspended; applicant can be considered once suspended driver's license is reinstated.</p> <p>At Verizon Information Services (VIS), applicants are not hired if they have a DUI/DWI conviction in last 3 years, per VIS Fleet Policy.</p>		Less Than 1 Year	<ul style="list-style-type: none"> ● If single minor offense, Hire. <p>If multiple minor offenses; or if single offense of DUI/DWI or reckless driving or motor vehicle homicide; No Hire.</p>

Type of Offense	Severity of Offense (Felony or Misdemeanor)	Timeframe Since Completion of Sentence or Probation or Parole	Recommended Action
		1-3 Years	<ul style="list-style-type: none"> • If single minor offense, Hire • If multiple minor offenses; or if single offense of DUI/DWI or reckless driving, look at evidence of rehabilitation and consider hiring. • If multiple offenses of DUI/DWI or reckless driving, or if single offense of motor vehicle homicide, No Hire
		Over 3 Years	Hire

GUIDELINES FOR USE FOR REVIEW OF JOB APPLICANTS WITH PRIOR CONVICTIONS (For New York Only)

No applicant should be automatically disqualified for a prior conviction. However, serious crimes (ex: homicide, sex crimes, robbery, burglary, felony assaults) require a higher showing that an applicant would not pose a significant risk to the Company. **New York's public policy is to encourage employment of ex-offenders.**

How to use this matrix:

Look at each case individually. Consider each factor and decision point. In cases where the applicant misrepresented or falsified prior convictions, the applicant is rejected (or terminated, if already on payroll) without further analysis. For the remaining decision points, where the information on the candidate is unfavorable put a minus in the analysis column, i.e. the applicant is slotted for a job which would bring them into a customer's home and the crime is of a violent nature. Where the information on the candidate is favorable, indicate such by a plus sign. For example, if several years have passed since the crime was committed, place a plus in the analysis column. Review the number of positives versus negatives in the analysis to help in the decision of whether to hire or reject the applicant.

Factors To Be Considered	Decision Points	Analysis of Individual Case + or -
Misrepresentation or Falsification	Applicants who misrepresented or falsified prior convictions are disqualified.	Applicant is rejected (or terminated if already on payroll).
Nature of job	For all crimes, nature of job applied for <u>must</u> be considered. For jobs involving direct physical contact with customers or the public, careful consideration should be given to whether an applicant convicted of a crime involving violence or larceny presents a significant liability risk to the Company.	
Nature of crime	?? Crimes involving integrity should weigh against applicants applying for positions with limited supervision or a high degree of trust. ?? If applicant is a repeat offender, this should weigh against the applicant.	

Factors To Be Considered	Decision Points	Analysis of Individual Case + or -
Age at time of crime.	If applicant was young at time of crime, this should weigh in applicant's favor.	
Time elapsed since crime.	Significant time elapsed since crime should weigh in applicant's favor.	
Applicant's explanation of reason crime was committed.	If crime committed under extenuating circumstances that would not be present in the work place, (e.g. domestic abuse) this should weigh in the applicant's favor. However, conviction for vehicular homicide would weigh against an applicant applying for a job requiring driving.	
Evidence of successful employment following crime.	Satisfactory employment history since crime, should weigh in applicants favor.	
Applicant has "certificate of relief from disabilities" or a "certificate of good conduct".	These certificates are issued by the criminal justice system and indicate that a prisoner has been an exemplary inmate. These should weigh in the applicant's favor.	

BIG RECOMMENDATION PROCEDURES AND E-MAIL EXAMPLES

To have a better understanding of how the BIG (Background Investigation Group) formulates its hiring recommendations, the following is a description of the different recommendations made by the BIG and examples of the various e-mails sent to the SAM.

The BIG (Background Investigation Group) receives the Employment Application from SAM and transmits it to the background investigation vendor (i. e., Choicepoint, Proudfoot, Hills & Assoc., or PRSI) for verification. The background investigation vendor provides its background investigation results to the BIG, which is compared to the information in the Employment Application. The BIG evaluates this information against the “Job Aid and Decision Matrix for Background Investigation Hiring Recommendation” guidelines in order to formulate its recommendation to the SAM.

There are four recommendations the SAM may receive from the BIG’s analyst, they are as follows:

1. RECOMMEND TO HIRE
2. CONTINGENT TO HIRE
3. RECOMMEND NOT TO HIRE, AT THIS TIME (**Pending Derogatory Info**)
4. RECOMMEND NOT TO HIRE

A detailed explanation, with examples, of each recommendation is set forth below:

1. RECOMMEND TO HIRE

This recommendation is made when the BIG’s analyst receives **complete results for all of the requested components requested by the SAM**. The “Hiring Recommendation Form” notifies the Staffer which components of the Background Investigation have been reviewed and completed, without findings of significant derogatory information. **Each component completed will be marked with an “X” beside it**. Any component that has a “NA” was not requested - or there was no history to search (i.e., applicant with no employment history – just out of school).

The following is an example of the Recommend To Hire e-mail notification and "Hiring Recommendation Form:"

To:	SAM 's Name	
From:	BIG Analyst Name	
Subject:	BI REPORT / Twain, Mark	Attachment: 1

SAM,		
Please See Attached.		

Attachment:

HIRING RECOMMENDATION FORM



06/11/2001

SECURITY REP: **BIG Rep.**
APPLICANT NAME: **Twain, Mark.**

THE FOLLOWING AREAS CONCERNING THE ABOVE APPLICANT HAVE BEEN REVIEWED WITHOUT SIGNIFICANT FINDINGS OF DEROGATORY INFORMATION:

<input checked="" type="checkbox"/>	EMPLOYMENT
<input type="checkbox"/> N/A	EDUCATION
<input checked="" type="checkbox"/>	CRIMINAL
<input type="checkbox"/> N/A	DL
<input checked="" type="checkbox"/>	SOCIAL SECURITY

THE APPLICANT CAN BE PLACED IN A JOB POSITION AT YOUR DISCRETION.

2. CONTINGENT TO HIRE

This recommendation is made when the BIG analyst has received results from the background investigation vendor, **but some of the BI component results are still pending**. If all of the information that has been received at this point is within the BI guidelines/hiring matrix, then the BIG analyst will notify the SAM which components of the Background Investigation have been reviewed and completed without findings of significant derogatory information. Each component completed will be marked with an "X" beside it. **Any component that is left blank is still pending results**, and any component that has a "NA" was not requested - or there was no history to search (i.e., applicant with no employment history). The BIG Analyst will send a "Contingent To Hire" e-mail to the SAM. The "Contingent to Hire" e-mail will also include the attachment called the "Hiring Recommendation Form." This form provides a checklist of the required fields that the BIG Analyst has checked per the SAM's request. **ONLY** the boxes for completed components will be marked with an "X," and those boxes left **BLANK** indicates which components are still pending information. This informs the SAM that the application **is not 100% complete, meaning the file is not closed**.

The following are examples of why the BI results may not be complete, but the BIG was able to make a Contingent To Hire recommendation:

- a) Employment –The BIG has not received seven years of employment history; the BIG Analyst may be working directly with the applicant to clarify information on the application; BIG Analyst might be waiting on a copy of the W-2 for the applicant's current employment due to the applicant not granting authorization for current employment history; request of verification has been sent to previous employer without response; or employer cannot locate employee records
- b) Education – The school/university has not responded to verbal or written verification(s); or the name on application is different from that on the diploma (maiden name); or the applicant listed the school at which they attended the most years but not the one from which they actually graduated; or the BIG analyst may be waiting on a copy of the actual diploma from the applicant
- a) Criminal History – The county or state has not responded to the request; or a county may have a "Mercy of the Court" policy, meaning the county has received the request but does not have the manpower to complete the request until a later date; or a possible name match for criminal history has been found, but more research is needed for confirmation

- b) Driver's License – incorrect or invalid license number is on the application, and the BIG is waiting for the applicant to clarify; or the driving section on the application is blank
- c) Social Security Number – incorrect or invalid SSN on the application, and the BIG is waiting for the applicant to clarify

When these situations occur, the BIG analyst will contact the applicant in order to obtain the necessary information, or is in contact with the BI vendor to determine the status of the pending information. Once this information is obtained, the file is closed and the SAM is notified **only** if the “hire” recommendation is changed due to **derogatory** information.

The “Contingent” Recommendation To Hire is to be considered FINAL unless the SAM sends a written request to be notified when the file(s) are actually closed; or if derogatory information is found, the BIG Analyst will send a “Reverse Recommendation.”

The following is an example of the Contingent To Hire e-mail notification and “Hiring Recommendation Form:”

To: SAM
From: BIG Analyst
Subject: BI REPORT / Twain, Mark
Attachment: 1

SAM,

Please See Attached.

Attachment:

HIRING RECOMMENDATION FORM



06/11/2001

SECURITY REP: BIG Rep.
APPLICANT NAME: Twain, Mark.

THE FOLLOWING AREAS CONCERNING THE ABOVE APPLICANT HAVE BEEN REVIEWED WITHOUT SIGNIFICANT FINDINGS OF DEROGATORY INFORMATION:

<input type="checkbox"/>	EMPLOYMENT
<input type="checkbox"/>	EDUCATION
<input checked="" type="checkbox"/>	CRIMINAL
<input checked="" type="checkbox"/>	DL
<input checked="" type="checkbox"/>	SOCIAL SECURITY

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As you can see by the recommendation above, the BIG Analyst has given a “Contingent” Recommendation To Hire. The components of Employment and Education are still pending; however, the BIG Analyst has enough information to send a recommendation. To clarify, the BIG Analyst continues to process the pending information until the file is closed. **ONLY** in the event, the BIG Analyst receives derogatory information, or the SAM request a written Final Status request would the BIG Analyst follow-up on this application. Otherwise, this would be the last communication the SAM would receive on this application.

3. RECOMMEND NOT TO HIRE AT THIS TIME

The BIG Analyst makes this recommendation **ONLY** when there is an **escalated possibility** that one or more of the components will have some derogatory information that **will need** to be more review, or if the information has not been confirmed by the background investigation vendor. In this situation, the BIG cannot make an educated recommendation on the eligibility of the applicant’s hiring status. When this occurs, the BIG’s analyst will send a Recommend Not To Hire At This Time e-mail (**no attachments**) notifying the SAM that derogatory information could be received. This e-mail will detail which fields are possibly derogatory, and will include a statement that the BIG’s analyst **will send a final recommendation** without a request from the SAM, as soon as the components in question are resolved.

The following is an example of a “Recommend Not to Hire At this Time” e-mail:

- 1) Example of a Recommend Not To Hire At this Time due to “possible derogatory information”:

To: SAM
From: BIG Analyst
Subject: BI REPORT / Twain, Mark
Attachment: 0

SAM,

1. Twain, Mark: Recommend Not To Hire, At this Time, due to possible derogatory criminal history. We have not received confirmed derogatory information, just a name match. Will send final ASAP.

As soon as the pending results for the application are received, the BIG Analyst will make a final recommendation. If **derogatory information is received**, then the BIG Analyst will send a "Final" recommendation to the SAM changing the recommendation to Recommend Not To Hire. If **the results received contains NO derogatory information**, then the BIG Analyst will send a "**Reverse Recommendation**" to the SAM, reversing the recommendation to Recommend To Hire. Please see below examples of final recommendations:

2) Final Recommendation to Recommend Not To Hire:

To: SAM
From: BIG Analyst
Subject: BI REPORT / Twain, Mark / **FINAL**
Attachment: 0

SAM,

1. Twain, Mark: Recommend Not To Hire, due to falsification of Criminal History. FILE IS CLOSED. Please send concurrence, if the applicant is on payroll, and authorization to send FCRA letters. (UNLESS ON PAYROLL – then the BIG Analyst would send the SAM documentation to forward to the employee)

3) **Reverse** Recommendation to Recommend To Hire:

To: SAM
From: BIG Analyst
Subject: BI REPORT / Twain, Mark / Reverse Recommendation
Attachment: 1

SAM,

We have received the pending information for possible criminal history. **ALL IS CLEAR**, please see Reverse Recommendation attached.

The attachment should look the same as the example for a Recommend To Hire as shown in the earlier example.

4. RECOMMEND NOT TO HIRE

This recommendation is made by the BIG's Analyst when the information received is obviously derogatory, and in violation of the Background Investigation Hiring Matrix. The BIG Analyst will phone the SAM to discuss the results, and will follow-up with an official, written Recommend Not To Hire e-mail. This e-mail recommendation will state which component(s) resulted in the Recommend Not To Hire. The e-mail will request a written concurrence of this recommendation; it will also inquire to the status of the applicant (is the applicant currently on payroll?); and will request authorization to send the FCRA letters to the applicant.

The following is an example of the Recommend Not To Hire e-mail notification:

To: SAM
From: BIG Analyst
Subject: BI REPORT / Twain, Mark
Attachment: 0

SAM,

1. Twain, Mark: Recommend Not To Hire, due to falsification of Criminal History. Please send reply with concurrence. Is the applicant currently on payroll? Please send authorization to send FCRA letters, if concurring.

The BIG Analyst will need to know at this time if the applicant is currently on the payroll in order to determine which FCRA letters need to be sent. If an applicant is rejected for employment with Verizon, due in whole or in part to any information found in the background investigation, then Verizon is required by law to send the FCRA letters to notify the applicant of their rights:

- 1) The first notification must include:
 - a) The first FCRA letter – Verizon is contemplating adverse action (either on payroll or not on payroll).
 - b) A copy of the Background Investigations Report.
 - c) “Prescribed Summary of Consumer Rights Under the Fair Credit Reporting Act” letter.
- 1) The second notification is a single letter notifying the applicant that Verizon has taken adverse action (either on payroll or not on payroll). This letter should be sent at least 24 hours after sending the first letter, unless the applicant is challenging the BI findings. In this instance, the SAM will advise if or when the second letter is to be sent.

If the applicant is on payroll, these packets will be forwarded to the SAM to distribute to the employee.

If the SAM wishes to proceed with hiring the applicant, despite a Recommend Not To Hire from the BIG, the SAM is required to discuss the matter with their Staffing Manager. Once a final decision is made, the Staffing Manager is required to send a written notification by e-mail informing the BIG Analyst of this decision.